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## State Water Resources Control Board

June 25, 2012

Stanley B. Grant Ph.D.  
Professor, Civil & Environmental  
Engineering  
The Henry Samueli School of Engineering  
ET 644C  
University of California, Irvine  
Irvine, California 92697-2575

Dear Professor Grant,

### **PEER REVIEW OF: 1) THE DRAFT AMENDMENT TO THE RECYCLED WATER POLICY AND 2) RELEVANT PORTIONS OF SCIENTIFIC ADVISORY PANEL REPORT**

The purpose of this letter is to initiate the review of a draft amendment to the Recycled Water Policy, which prescribes monitoring requirements for constituents of emerging concern (CECs) in recycled water used for groundwater recharge and for CEC surrogates in recycled water used for landscape irrigation. The basis for this amendment, relevant portions of a scientific advisory panel report, is also a subject for review.

The Recycled Water Policy, adopted in February 2009, directed the State Water Board, in consultation with California Department of Public Health, to convene a scientific advisory panel (Panel) to provide guidance on future actions related to monitoring of CECs in recycled water. The Panel was established in June 2009. The Panel submitted a report titled: "Monitoring Strategies for Chemicals of Emerging Concern (CECs) in Recycled Water – Recommendations of a Scientific Advisory Panel" (Panel Report). The Panel Report provided recommendations for monitoring specific CECs (page 66 of the Panel Report) in recycled water. The State Water Board incorporated the Panel's recommendations into the draft amendment of the Recycled Water Policy. The draft amendment of the Recycled Water Policy adds monitoring requirements, specifying constituents, locations, and frequencies, for CECs and CEC surrogates.

Attached to this letter are three key documents:

- a) The April 22, 2012, request for external reviewers signed by Gordon Innes, including six (6) attachments;
- b) The Panel Report; and
- c) The January 7, 2009, Supplement to the Cal/EPA Peer Review Guidelines.

Comments on the three documents listed above:

1. You have been sent the request letter, including its attachments, during the solicitation process for reviewer candidates conducted by the University of California.
2. Attachment 2 to the request letter provides focus for the review. I ask that you address all topics, as expertise allows, in the order listed.
3. The January 7, 2009, Supplement – you received this earlier when you were approved as a reviewer. I am sending it again to make certain that you have it. In part, it provides guidance to ensure the review is kept confidential through its course. The supplement notes that reviewers are under no obligation to discuss their comments with third-parties after reviews have been submitted. We recommend they do not. All outside parties are provided opportunities to address a proposed regulatory action through a well-defined regulatory process. Direct third-parties to Meleneé Emanuel at [memanuel@waterboards.ca.gov](mailto:memanuel@waterboards.ca.gov) or (916) 341-5271.

The most efficient process for this review is to:

1. Read Attachment 5 identified in the April 22 peer review request letter, which appears as Attachment A to the draft revised Recycled Water Policy – the CEC monitoring requirements.
2. Read the Panel Report noting the portions that are relevant to Attachment A of the draft revised Recycled Water Policy. The relevant portions of the Panel Report are indicated in *“Scientific Issues to be Addressed by the Peer Reviewers”* (Attachment 2 of the peer review packet).

The above two documents should give enough background information to address the issues in Attachment 2 of the request for peer review.

The draft revised Recycled Water Policy is Attachment 6 of the peer review request letter. It provides context on how the proposed CEC monitoring requirements relate to the Recycled Water Policy.

Please return your review directly to Meleneé Emanuel. Questions about the review, or review material, should be for clarification, in writing (Email is fine.), and addressed only to Meleneé Emanuel. The responses will be in writing as well. All this information will be posted at the program website, and the State and Regional Water Board’s Scientific Peer Review website.

I would appreciate your review being completed within 30-days receipt of the peer review packet.

Your acceptance of this review assignment is most appreciated.

Sincerely,

Gordon Innes  
WDR – Policy Unit Chief  
Division of Water Quality  
State Water Resources Control Board  
Sacramento, CA, 95814  
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Enclosure:

- April 22, 2012 – Request for External Peer Review of a Draft Amendment to the Recycled Water Policy Regarding Monitoring Requirements for Constituents of Emerging Concern (CECs) in Recycled Water and the Report “Monitoring Strategies for CECs in Recycled Water and the Report “Monitoring Strategies for CECs in Recycled Water – Recommendations of a Scientific Advisory Panel”, which is the Scientific Basis of the Recycled Water Policy Amendment.
- Attachment 1 – Summary of Monitoring Requirements for Constituents of Emerging Concern in Recycled Water
- Attachment 2 – Scientific Issues to be Addressed by Peer Reviewers
- Attachment 3 – List of Participants
- Attachment 4 – List of References and CD with Reference Materials
- Attachment 5 – Draft Attachment A Requirements for Monitoring Constituents of Emerging Concern for Recycled Water
- Attachment 6 – revised draft Recycle Water Policy
- Supplement to Cal/EPA External Scientific Peer Review Guidelines – January 7, 2009